

**Questions for Remedial Project Manager and Project Team
Region 2 Site Visit: Lower Passaic River Study Area**

Discussion Questions

1. Please describe the Region's role in the Superfund remedial response process for the Lower Passaic River Study Area and Focused Feasibility Study Area.
2. We are interested in learning more about the background and rationale behind the Region's decision to conduct a Focused Feasibility Study (for the lower 8 miles of the river) and issue a Proposed Plan for this area. How did the Region determine that this decision was appropriate in light of CERCLA, the National Contingency Plan (NCP), and EPA's guidance on Superfund sediment sites?
3. Please describe the entities outside of EPA involved in the remedial response process for the Lower Passaic River and the Focused Feasibility Study Area (lower 8 miles of the river), such as other federal and state agencies, and Potentially Responsible Parties (PRPs). How does EPA coordinate with these external parties (e.g., how frequently at what stages of the process)?
4. How has the project coordinated with EPA HQ during the remedial response process for the Lower Passaic River site and the Focused Feasibility Study Area?
 - a. How often during the remedial response process has this coordination taken place, and at what points in the process?
 - b. How has this coordination helped or hindered decision making during the remedial response process, especially during remedy selection for the Focused Feasibility Study Area?
5. Please describe how the Region has considered and implemented EPA's "Principles for Managing Contaminated Sediment Risks at Hazardous Waste Sites" and "Contaminated Sediment Remediation Guidance for Hazardous Waste Sites" during the remedial response process for the Lower Passaic River site and the Focused Feasibility Study Area.
 - a. What is your opinion of the sediment site guidance documents?
 - b. What challenges, if any, has the site team experienced in implementing these directives and guidance in relation to the remedial response process for the Lower Passaic River site and the Focused Feasibility Study Area?
6. Please provide an example of a decision implemented at the site during the RI/FS phase or development of the Proposed Plan that was rooted in the guidance provided by these documents. How was the guidance beneficial in this scenario?
7. Please provide an example of a decision implemented at the site during the RI/FS phase or development of the Proposed Plan that departed from the sediment site guidance. Why was the guidance not applicable or implementable in this scenario?
 - a. In this scenario, was the Region required to provide an explanation to HQ as to why it departed from the guidance? If no, do you think this would be a helpful addition to the process?

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8. According to the “Contaminated Sediment Remediation Guidance for Hazardous Waste Sites,” given that there are limited number of approaches available for managing contaminated sediment, project managers should evaluate each of the three major approaches (monitored natural recovery, in-situ capping, and removal through dredging or excavation) at every sediment site. How did the project team evaluate the available methods for the development of the Proposed Plan and determine which method, or combinations of methods, were the most appropriate for achieving the site’s goals?
9. How does EPA ensure that other parties involved in the cleanup of the site, such as PRPs or contractors hired by EPA or the PRPs for sampling or future construction, follow the sediment site guidance?
10. In addition to the sediment guidance, we understand that EPA uses nine criteria to evaluate cleanup options as described in the NCP. How did the project team evaluate the cleanup alternatives against these nine criteria for the development of the Proposed Plan for the Focused Feasibility Study Area?
 - a. For example, what steps did the project team take to evaluate the cost of the cleanup alternatives? What factors in this analysis contributed to EPA selecting its preferred cleanup option over other alternatives?
11. We are interested in learning about the development and use of the Consideration Memo that was prepared by the Lower Passaic River Study Area team for the CSTAG.
 - a. Please describe how the project team used the “Principles for Managing Contaminated Sediment Risks at Hazardous Waste Sites” to develop its Consideration Memo. How has the project team used the Consideration Memo to guide its work on the site and the Focused Feasibility Study Area?
 - b. Please describe the process used by the Region for considering and responding to recommendations on the Consideration Memo provided by the CSTAG, including how the Region determines which recommendations to implement or not implement.
12. We are also interested in learning more about how the project team has considered the input from the CSTAG, NRRB, and EPA HQ in developing the Proposed Remedy for the FFS Study Area.
 - a. Please describe how the project team has worked with the CSTAG, NRRB, and EPA throughout the remedial response process for the Focused Feasibility Study Area. How, if at all, has this relationship evolved with the Region’s decision to issue a proposed plan for the Focused Feasibility Study Area?
 - b. Please describe the process that the project team has used to consider and respond to the recommendations provided by the CSTAG and NRRB on the Proposed Plan for the Focused Feasibility Study Area.
 - c. What is your opinion on the recommendations from these groups?

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- d. What challenges, if any, has the project team experienced in working with the CSTAG and NRRB on the Focused Feasibility Study Area or overall Lower Passaic River site?
 - i. How, if at all, could the CSTAG and NRRB review process be improved?
 - e. We understand that the primary role of the NRRB is to review the Proposed Remedy prior to its release to the general public. How, if at all, has the project team been continuing to work with the CSTAG and EPA HQ on the development of the forthcoming Record of Decision?
13. What challenges, if any, does the Region face in the cleanup of the Lower Passaic River Study Area and Focused Feasibility Study Area? What opportunities, if any, exist to address these challenges?
14. Are there any best practices or lessons learned that you would like to share with us with regard to your work on the Lower Passaic River Study Area and Focused Feasibility Study Area and approaches to sediment site management?